

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

IN RE:)	
)	
TONYA ANNE DARNELL)	Case No. 17-35306-KRH
)	Chapter 13
Debtor)	

**SECOND MOTION FOR EXTENSION OF TIME FOR FILING CERTIFICATE
OF COMPLETION OF POST-PETITION FINANCIAL MANAGEMENT
COURSE AND CERTIFICATION PURSUANT TO 11 U.S.C. § 1328**

COMES NOW the Debtor, by counsel, and files this Second Motion to Extend the Time for the Filing of the Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328; and in support hereof states unto the Court as follows:

1. The Debtor filed the Chapter 13 petition herein on October 24, 2017.
2. The Debtor has completed the Chapter 13 Plan payments and on June 6, 2020 the Court issued a Notice to Debtor and Creditors Concerning Issuance of Discharge.
3. Counsel for the Debtor has had difficulty in contacting the Debtor to remind the Debtor of the requirement to complete the Post-Petition Financial Management Course and sign the Certification Pursuant to 11 U.S.C. § 1328.

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218
(804) 225-9500 (phone)
(804) 225-9598 (fax)
jkane@kaneandpapa.com
Counsel for Debtor

4. By Order entered herein on July 24, 2020, the Court extended the time for the above requirements to August 4, 2020. Counsel for the Debtor has still been unable to communicate with the Debtor and needs additional time to do so.

WHEREFORE, the Debtor respectfully requests that the Court enter an Order extending the time for the filing of the Debtor's Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328, and for such other relief as the Court may deem appropriate.

Respectfully submitted,

TONYA ANNE DARNELL

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218
(804) 225-9500 (phone)
(804) 225-9598 (fax)
jkane@kaneandpapa.com
Counsel for Debtor

CERTIFICATE OF SERVICE

I hereby certify that on August 4, 2020, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all parties registered to receive notice thereof and to all creditors and parties in interest on the attached mailing matrix.

/s/ James E. Kane
James E. Kane

**IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:)	
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)	Chapter 13
Debtor)	

NOTICE OF MOTION AND HEARING

The above Debtor has filed a Second Motion to Extend the Time for the Filing of Certificate of Completion of Post-Petition Financial Management Course and Certification Pursuant to 11 U.S.C. § 1328.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)

If you do not want the court to grant the relief sought in the motion, or if you want the court to consider your views on the motion, then you or your attorney must:

- File with the court, at the address shown below, a written request for a hearing [or written response pursuant to Local Bankruptcy Rule 9013-1(H)]. If you mail your request for a hearing (or response) to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above, to:

Clerk of Court
United States Bankruptcy Court
701 East Broad Street
Richmond, VA 23219

You must also mail a copy to:

James E. Kane, Esquire
Kane & Papa, P.C.
1313 East Cary Street
Richmond, Virginia 23219

- Attend a hearing scheduled for **August 26, 2020 at 12:00 p.m. at 701 E. Broad Street, Room 5000, Richmond, VA 23219.** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Respectfully submitted,

TONYA ANNE DARNELL

By: /s/ James E. Kane
Counsel

James E. Kane (VSB #30081)
KANE & PAPA, P.C.
P.O. Box 508
Richmond, VA 23218
(804) 225-9500 (phone)
(804) 225-9598 (fax)
jkane@kaneandpapa.com
Counsel for Debtor

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/s/ James E. Kane
James E. Kane

Label Matrix for local noticing

United States Bankruptcy Court
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AMCA

0422-3

701 East Broad Street

Attention: Bankruptcy

Case 17-35306-KRH

Richmond, VA 23219-1888

4 Westchester Plaza, Suite 110
Elmsford, NY 10523-1615

Eastern District of Virginia

Richmond

Fri Dec 8 09:15:58 EST 2017

AmSher Collection Srv

Amy Baker

City of Richmond

4524 Southlake Parkway

9347 Count Christopher Drive

PO Box 26508

Suite 15

Mechanicsville, VA 23116-6528

Richmond, VA 23261-6508

Hoover, AL 35244-3271

City of Richmond City Hall

Credit Control Corp

(p)FORD MOTOR CREDIT COMPANY

Room 109 Delinquent Taxes

Po Box 120568

P O BOX 62180

900 East Broad Street

Newport News, VA 23612-0568

COLORADO SPRINGS CO 80962-2180

Richmond VA 23219-1907

Ford Motor Credit Company, LLC

Henrico Doctors Hospital

MCV Associated Physicians

c/o Randolph, Boyd, Cherry and Vaughan

1602 Skipwith Rd

P O Box 91747

13 East Main Street

Henrico, VA 23229-5298

Richmond, VA 23291-1747

Richmond, VA 23219-2109

MCV Hospitals

MCV Physicians

Northumberland County

P.O. Box 980462

PO Box 91747

P.O. Box 297

Richmond, VA 23298-0462

Richmond, VA 23291-9747

Heathsville, VA 22473-0297

Northumberland Treasurer

Randolph Boyd Cherry & Vaughan

Southwest Credit Systems

72 Monument Place

14 East Main Street

4120 International Pkwy

Heathsville, VA 22473-3336

Richmond, VA 23219-2110

Ste 1100

Carrollton, TX 75007-1958

Sternrecsvcs

United Consumers

Verizon

415 N Edgeworth St Ste 210

14205 Telegraph Rd

Verizon Wireless Bankruptcy

Greensboro, NC 27401-2071

Woodbridge, VA 22192-4615

500 Tecnolgy Dr Ste 500

Weldon Springs, MO 63304-2225

Carl M. Bates

James E. Kane

Judy A. Robbins

P. O. Box 1819

Kane & Papa, PC

Office of the U.S. Trustee - Region 4 -R

Richmond, VA 23218-1819

1313 East Cary Street

701 E. Broad Street, Suite 4304

P.O. Box 508

Richmond, VA 23219-1849

Richmond, VA 23218-0508

Tonya Anne Darnell

P.O. Box 262

Mechanicsville, VA 23111-0262

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

